

U.S. DISTRICT COURT
N.D. OF N.Y.
FILED

JAN 18 2018

LAWRENCE K. BAERMAN, CLERK
~~NOTICE~~ OF
MOTION FOR
LEAVE TO AMEND
FOR A SECOND
AMENDMENT
42, USC 1983
CIVIL CASE NO
9:15-CV-390
TJM/CFH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

JAVELL FOX

Plaintiff

VS

SUPERINTENDANT LEE ET AL
Defendant

PLEASE TAKE NOTICE THAT on the Declaration
of Javell Fox served with this notice and on all
the pleadings and proceedings in this action the
undersigned will move this court at the James
T. Foley U.S. Courthouse 445 Broadway - Room 409
Albany N.Y 12207 Held by Hon Christian F.
Hummel on February 14, 2018 at 10 o'clock
in the forenoon or as soon thereafter as
counsel can be heard for leave to Amend for
A second Amendment by the insertion of
Defendants officer Krantz, Charles Barnard,
Sgt Hahn, Officer Rovelli, Commissioner Assistant
MS K, Mr Iffert, Mr Hernandez, Mr Giannino,
Mr Fuller, Mr Haff, Mr Frier, Mr Will,
Mr Borowski, Officer Malark, Mr Brown,
correction officer fliss, Mr Venitozzi,

officer Brady, New York state department
 of corrections and community supervision,
 and the state of New York. paragraphs
 149 - 247. causes of Action 156 - 234.
 Harassment; cruel and unusual punishment;
 Fourth Amendment violations, Freedom of
 speech, Discrimination SGT Bey, causes of
 Action 156-160. sexual Harassment, cruel
 and unusual punishment; fourth Amendment
 Violations; Harassment; officer Krantz. Due
 Process violation Charles Barnard, 161-165.
 Cruel and unusual punishment, Harassment, and
 Retaliation SGT Barg causes of Action 166-168.
 SGT Hahn First Amendment violation; cruel
 and unusual punishment; Religious Land Use
 and Institutionalized persons Act (RLUIPA),
 Retaliation; 169-172-causes of Action -
 Harassment; Retaliation; First Amendment
 violations; freedom of speech violations;
 Discrimination; Equal protection of the
 Law; officer Rovell, causes of Action 173-
 178. Discrimination, Equal protection
 SGT Hahn 179-180 causes of Action. Due pro-
 cess violation officer K causes of Action
 181. Harassment officer Tiffert cause of
 Action 182. First Amendment Freedom of

religion violations; Freedom of speech violations;
 Religious land use and institutionalized
 persons act (RLUIPA); Discrimination;
 Equal protection violations. 183-187 causes
 of Action. Due process, discrimination,
 Equal protection; cruel and unusual
 punishment causes of Action 188-191
 (t Giannino, Freedom of Religion violations;
 Religious land use and Institutionalized
 Persons Act; Freedom of expression; Discrimi-
 nation; Equal protection, Harassment
 and Retaliation s6t Fuller. causes of Action
 192-198. Freedom of religion; Freedom
 of Expression; Religious Land use and Insti-
 tutionalized persons Act; Harassment;
 Retaliation; cruel and unusual punishment;
 Discrimination; Equal protection; causes
 of Action 199-206. Due process; cruel
 and unusual punishment; Discrimination;
 Equal protection; 207-210 causes of
 Action. Freedom of religion; Freedom
 of Expression; Religious land use and
 Institutionalized persons Act; cruel
 and unusual punishment; Discrimination;
 and Equal protection, causes of action
 211-216. Due process violation; cruel

and unusual punishment; discrimination
 Equal protection; Lt Borowski causes of
 Action 217-220. Harassment; cruel and
 unusual punishment, officer Malark causes
 of Action 221-222. Due process violations;
 cruel and unusual punishment; Lt Brown -
 CAUSES OF ACTION 223-224. Harassment officer
 Fliess cause of action 225. Discrimination; Due
 Process cause of Action 226-227. Excessive
 Force cause of actions 228th officer Brady.

Equal protection, New York state Department
 of correction and community supervision - causes
 of Action 229th failure to supervise 230th -
 failure to protect 231st. state of New-
 York ~~cause~~ failure to train; Equal protection;
 Failure to supervise. Causes of action
 232-234, or as may be just, such further
 relief.

January 10, 2018

Janell ZP
 Janell Fox

TO: Maria Liss-Murray
 ASST ATT GEN
 The Capitol
 Albany NY 12224

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